Bell Atlantic
1300 I Street N.W.
Suite 400 West
Washington, DC 20005
202 336-7824 Fax 202 336-7922
E-Mail: Dolores.A.May@BellAtlantic.com

Dee May
Director
Federal Regulatory Affairs

ORIGINAL

Bell Atlantic

EX PARTE OR LATE FILED

December 3, 1999

RECEIVED
DEC 3 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

Please find attached a letter to Ms. Johanna Mikes of the Common Carrier Bureau that answers questions she raised in the above proceeding. We are filing a confidential portion of the submission and a redacted version of the entire submission. Attachment 3 of the letter contains customer proprietary information.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is filing information in direct response to direct questions raised by Commission staff.

Please feel free to contact me with any questions.

Sincerely,

Dee May

Attachments

cc: A. Kearney
J. Mikes

No. of Copies rec'd 0+1
List ABCDE

REDACTED, FOR PUBLIC INSPECTION

Bell Atlantic
1300 I Street N.W.
Suite 400 West
Washington, DC 20005
202 336-7824 Fax 202 336-7922
E-Mail: Dolores.A.May@BellAtlantic.com

Dee May
Director
Federal Regulatory Affairs

December 2, 1999

Ms. Johanna Mikes
Common Carrier Bureau-Policy Division
445 12th Street, SW – Room 5-C125
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Mikes,

This responds to questions you asked concerning BA-NY's operations support systems (OSS) and the interfaces provided to CLECs to obtain access to them.

1. BellSouth's Flow Through: As explained in the Reply Comments, the flow through percentages discussed in connection with BellSouth's second Louisiana application were calculated differently than the flow through measures that Bell Atlantic reports. First, while both BellSouth and Bell Atlantic include only electronically received orders in the measure, virtually 100% of CLEC orders submitted to Bell Atlantic are received electronically. Dowell/Canny Reply Decl. ¶ 43. At the time BellSouth filed its second Louisiana application, however, a significant number of CLEC orders were submitted by fax, mail, or telephone calls. *See* BellSouth Application, Funderburg Aff. (Appendix A, Volume 2, Tab 7) ¶¶ 23-28; 45-53; 69-73; 82-87; 107-110 (describing non-electronic ordering process for basic, complex, designed and non-designed resale services and UNEs); Stacy OSS Aff. (Appendix A, Volume 5, Tab 22) ¶ 86 (EDI supports electronic ordering for "service that represent 80% of BellSouth's total retail operating revenue). *See also* First Louisiana Order, 13 FCC Rcd 6245 at ¶ 25 and n. 82 (1998).

Second, as explained by Mr. Dowell and Ms. Canny, BellSouth only included flow through eligible orders in its flow through measure, while Bell Atlantic's % Total Flow Through measure includes all valid electronically received orders whether they are of a type designed to flow through or not. Dowell/Canny Reply Decl. ¶ 43; BellSouth Application, Stacy Performance Measures Reply Aff. ¶ 21 (discussing erroneous inclusion of "LESOG ineligible" orders in flow through measurements) and Exh. WNSPM Reply – 4a through 4e (showing calculation of flow through based on "LESOG eligible" orders). In this regard, BellSouth's flow through measurement is similar to Bell Atlantic's % Achieved Flow Through measure, which is based on orders designed to flow through.

Finally, as previously explained (Dowell/Canny Reply Decl. ¶ 43), BellSouth excluded from its flow through measurement all orders with CLEC errors. *See* Exh. WNSPM Reply – 4a through 4e.. While Bell Atlantic excludes CLEC errors that are rejected up front, there are some CLEC errors that are not rejected but cause orders that would otherwise flow through to be sent to the TISOC for manual processing. These orders have been included in Bell Atlantic's flow through measures for both Total and Achieved Flow Through. *See* Miller/Jordan Decl. ¶ 59; Miller/Jordan/Zanfini Reply Decl. ¶ 36; Dowell/Canny Reply Decl. ¶ 43. If Bell Atlantic measured flow through in the same way that BellSouth did for its second Louisiana application, Bell Atlantic's September flow through rate would be in excess of 80% for UNEs and 87% for resale. Dowell/Canny Reply Decl. ¶ 43.

2. Carrier-to-Carrier Consideration of Order Accuracy: As explained in the Reply Comments, Bell Atlantic conducted a detailed analysis of a random sample of orders that were scored as "inaccurate" in the order accuracy metric process. The results of that analysis were described in the Dowell/Canny Reply Decl. at ¶¶ 40-41, and details were provided in Attachment G to the Reply Decl. That analysis showed that many orders scored as "misses" were in fact accurate – sometimes the "miss" resulted because the Bell Atlantic TISOC representative had corrected a CLEC error, resulting in a literal mis-match of the LSR and service order; other times the "miss" was the result of a missing RSID or AECN on a service order where it was not required. In short, based on the detailed analysis, Bell Atlantic's order accuracy for September was 87%, not 42% as the C2C results show.

Bell Atlantic has presented the detailed analysis to the Carrier-to-Carrier working group and has agreed to propose refinements to the measurement.

3. Reporting of Missed Due Dates: As explained in the Application, Bell Atlantic reports the percent of orders which, because of Bell Atlantic's fault, were not completed by the due date to which Bell Atlantic committed. Dowell/Canny Decl. ¶ 68. If Bell Atlantic changes the due date on an order, that order is counted as an appointment missed for Bell Atlantic reasons. If a CLEC changes the due date on an order, that would count as a miss for customer reasons. If, however, Bell Atlantic missed the rescheduled due date, then the order would instead be counted as a miss against Bell Atlantic. The various missed appointment measures reported by Bell Atlantic are described in the Carrier-to-Carrier Guidelines under metric PR-4 and the various missed appointment codes are set out in Appendix B. Bell Atlantic provided a copy of the Carrier-to-Carrier Guidelines dated July 12, 1999 as Attachment B to the Dowell/Canny Declaration. On November 15, 1999 Bell Atlantic filed revised Guidelines in compliance with the New York PSC's November 5 order. A copy of the revised Guideline's description of the missed appointment metric and the Attachment B missed appointment codes are attached to this letter as Attachment 1.

4. Interface Availability Metric: The Application describes the measurement for interface availability. Dowell/Canny Decl. ¶¶ 25-26. In its November 5 order, the

New York PSC adopted several changes to this measurement that had been discussed and agreed to by the Carrier-to-Carrier working group. *Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies,* Case 97-C-0139, Order Establishing Additional Inter-Carrier Service Quality Guidelines and Granting In Part Petition for Reconsideration, Clarification, and Stay (November 5, 1999) at 15-16. A copy of the revised description of this metric from the Carrier-to-Carrier Guidelines dated November 15, 1999 is attached to this letter as Attachment 2.

5. Clarification of Retail Maintenance and Repair Processes: Staff has asked for clarification of the description of the "LiveWire (LW)" front end for retail maintenance and repair functions found in the KPMG Report at M&R5 V 3, 19. As KPMG noted, Bell Atlantic's previous retail front end – StarRep – was not Y2K compliant and therefore was recently replaced. For maintenance and repair transactions, the retail front end that KPMG called LW is referred to as Caseworker by Bell Atlantic. The discussion below clarifies KPMG's description of the new retail front end.

The various OSS functions that are used in the retail environment are described in Bell Atlantic's Application and Reply Comments. (See, e.g., Miller/Jordan Decl. ¶¶ 68-69, 72, 79; Miller/Jordan/Zanfini Reply Decl. ¶¶ 57-59.) In addition, KPMG thoroughly reviewed Bell Atlantic's maintenance and repair processes for both retail services and for CLECs, and concluded that Bell Atlantic satisfactorily provided parity both in access to the maintenance and repair OSS (M&R1 V 19-23)[1] and overall maintenance and repair processes (M&R5 V 69-84).[2]

Attachment 3 shows the Trouble Entry (i.e., Create Trouble) screens for retail POTS (p. 1) and for retail special services (p.2) using Caseworker. For a POTS trouble, the Bell Atlantic retail representative initially has a trouble report introductory screen on which he or she provides the customer's telephone number and an indication of whether or not the line is "in use" (i.e., whether the customer used the line for which the trouble is being reported to call in the trouble). When the retail representative submits that information, Caseworker then returns the screen shown on page 1 of Attachment 3. If the representative indicated that the line was not in use, Caseworker initiates a Mechanized

---

[1] KPMG evaluated as "Satisfied, with Qualification" the access to trouble history. *Id.* at 23. As explained in the Application, in June 1999, BA-NY implemented an Extended Trouble History Feature in RETAS which provides CLECs the same functionality available to Bell Atlantic's retail representatives for historical trouble data. Miller/Jordan Decl. ¶ 72.

[2] KPMG suggested two areas of improvement in this section (dealing with trouble reports where the CLEC directs BA-NY to dispatch to the wrong location and the entry of trouble reports in the first 24 hours after installation). *Id.* at 83-84. As explained in the Application and Reply Comments, Bell Atlantic already has implemented improvements to address both of these areas. Miller/Jordan Decl. ¶¶ 77-79; Miller/Jordan/Zanfini Reply Decl. ¶¶ 58-59.

Line Test (MLT).[3] When the test is completed, the result is provided to the retail representative in the field labeled "MLT Results." The representative provides any additional information needed for handling the trouble in the remaining fields on the screen, then submits the trouble to Bell Atlantic's back-end system. The "Commitment Times" shown in the bottom, left-hand corner of the screen enable the representative to inform the customer when the trouble is expected to be fixed. The times returned depend on the customer's class of service (e.g., business vs. residence). The "Type" codes refer to different trouble types: OS = Out of Service; AS = Affecting Service; CO = usually a feature or switch problem. Depending on the maintenance work load, the commitment times for these trouble types could be different (for example, Bell Atlantic gives priority to troubles where the customer is out of service).

A retail representative enters a special services trouble using the screen shown on page 2 of Attachment 3. The representative must provide the Circuit ID, then submits the trouble which is directed to Bell Atlantic's back-end systems. A retail representative has no ability to conduct a line test on a special services trouble.

Attachment 4 shows the Trouble Entry or Create Trouble screen for a CLEC using the Web GUI. (Although Attachment 4 contains four pages, this is presented to the CLEC representative as a single screen which he or she scrolls through.) The CLEC can use this screen to enter a trouble ticket for any type of local service (e.g., POTS, Specials,[4] IOF, interconnection trunks, PBX, CENTERX, ISDN, aDSL, Coin, resale or UNE). To allow this flexibility, the Create Trouble screen presents the CLEC with a variety of fields. As shown in Attachment 4, only six fields are required. Several others are "conditional" and would be provided by the CLEC in specific situations (for example, if the MLT indicates that a dispatch is needed, the CLEC would provide the authorization for dispatch and would also provide information about obtaining access to the end user's premises).

When a CLEC submits the trouble, Bell Atlantic returns a trouble ticket number and a commitment time. The commitment time matches those presented to the retail representatives based on the class of service and the trouble type. Once the CLEC representative submits the trouble through the GUI, it flows to Bell Atlantic's back end systems and is handled in the "core factory" identically to a retail trouble. *See* KPMG Report M&R1 V 19-20. The CLEC representative using the GUI also has the same ability as a retail representative to fix a vertical feature while the customer is on line, or to forward calls that are made to an out of service line to another line while the repair is being made. *See* Miller/Jordan Decl. ¶ 69; Dowell/Canny Decl. ¶ 167. The only difference is the front end. While a CLEC that wanted to keep a record of a customer's

---

[3] If the line was in use, no MLT is initiated, because it would return a result of "Test O.K."

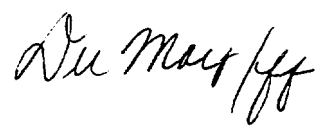
[4] As explained in the Application, Bell Atlantic has provided CLECs with the ability to conduct a test on a special services trouble. Miller/Jordan Decl. ¶ 68. The Bell Atlantic retail representative who receives the call from the end user does not have this capability. Instead, the retail representative submits a trouble ticket and the repair center that receives the ticket conducts a test before deciding how to handle the trouble.

troubles in its own system would have to input that information separately, there is really no need to do so. Because it is Bell Atlantic's responsibility to repair and maintain both resale services and unbundled elements, pertinent information is maintained in Bell Atlantic's systems. The CLEC using the GUI has the same ability to retrieve the trouble history for its customer as a retail representative would for a Bell Atlantic customer. Miller/Jordan Decl. ¶ 72. Bell Atlantic does not include its own customers' trouble information on the customer service record, which contains the account and billing information that a CLEC needs to maintain on its customers. Instead, as indicated above, trouble information is maintained in the repair and maintenance systems, to which both retail representatives and CLEC representatives have equivalent access.

6. Create Trouble Response Times: As explained in the Application, the measurement of the response time for wholesale Create Trouble transactions captures transactions that require more extensive processing than does the measurement for retail Create Trouble transactions. Dowell/Canny Decl. ¶¶ 80, 167. For example, for retail, Bell Atlantic measures only the creation of a trouble ticket. For CLECs, the measurement of the Create Trouble transaction includes not only the creation of a trouble ticket, but also CLECs' use of StarMem to fix a feature problem while the customer is on-line. StarMem transactions generally take longer to process than a simple trouble ticket creation, and therefore including them in the average makes the response time for CLECs appear longer. *Id.* ¶ 167. In addition, the CLEC Create Trouble response time includes the return of a trouble ticket number to the CLEC. *See id.* ¶ 80. Returning a trouble ticket number allows the CLEC to perform other maintenance and repair functions (such as Status and Modify Trouble) using either the trouble ticket number of the telephone number. A trouble ticket number is not returned to the retail representative who enters a trouble. If he or she wants to obtain that number, it requires an additional step. As a result, however, the response time for a wholesale Create Trouble transaction is somewhat longer than the response time for a retail transaction.

Please let me know if you have any questions.

Sincerely,



cc: A. Kearney

ATTACHMENT 1

Function:

PR-4 Missed Appointments

Definition:

The Percent of Orders completed after the commitment date.
LNP: The percent of orders completed on Time (not early)
Trunks: Includes reciprocal trunks from BA to CLEC. The percentage of trunks completed for which there was a missed appointment.

moved to PR-8

Exclusions:

- BA Test Orders
- Disconnect Orders
- Bell Atlantic Administrative orders [5]
- Additional Segments [6] on orders (parts of a whole order are included in the whole)
- Orders that are not complete. (Orders are included in the month that they are complete)
- Suspend for non-payment and associated restore orders.

Performance Standard:

Parity with BA Retail [7]
Retail Comparison for IOF and EEL is total actual Retail Specials performance
LNP: 95% on Time

Report Dimensions

Company:	Geography:
• BA Retail • CLEC Aggregate • CLEC Specific	• POTS and Complex: Manhattan, Greater Metro, Suburban and North-State • Specials & Trunks: NY State (LATA 132 and Remaining State – as identified)

[5] BA Administrative Orders – See Glossary
[6] Segments – See Glossary
[7] % Missed Appointment Customer – No Standard – Not in Control of Bell Atlantic

SORD Code Tables: (Service Order Database Codes)

ORDER TYPE:
Defines what type of service is requested

N	New Service
T	The "To" portion when a customer moves From one address To another address
C	Change request to existing service (add or remove features/services)

Appointment Type Code (ATC):
This code identifies how the appointment date was derived

W	The customer accepted the company's offered due date
X	The customer requested a due date that was greater than the company's offered Due date
S	The customer requested a due date that was earlier than the companies offered due date
C	The customer requested a special due date to coordinate a hot cut.
R	A due date could not be applied due to company or customer reasons.

Missed Appointment Code (MAC):
When the original scheduled due date is missed a code is applied to the order to identify the reason for the miss

Customer Missed Appointment:

SA	Access could not be obtained to the customers premises(customer not at home)
SR	Customer was not ready to receive the new service
SO	Any other customer caused reason for the delay (e.g., unsafe working conditions at the customer site)
SL	Customer requested a later appointment date prior to the due date
SP	Customer requested an earlier appointment date prior to the due date
—	Under Development: CLEC Not Ready
—	Under Development: CLEC Not Ready – due to late FOC

Company (BA) Missed Appointment:

CA	The cable pair from the BA central office to the customer premises could not be Assigned by the due date due to any reason, including assignment load. If after the due date it is determined that no facilities were available, a CF miss is applied.
CB	The BA business office taking the request caused the delay (misplaced the order)
CC	A Common Cause that affected a large area caused the delay (Hurricanes/work stoppages)
CF	The assigned cable facility was bad
CL	Not enough BA technicians to complete the work on a given day
CO	Any other delay caused by the Company not listed here (e.g., Technicians truck broke down)
CS	The BA Central office work was not complete (line not programmed)

SWO:
A code applied when the order is completed to identify the service grouping

NR	Residence service
NL	Small business (2 lines or less)
NV	Large business (3 lines or more)
NF & NC	Internal BA service
NS	Special services
NP	BA Coin services
NI	Private Public Pay Phone (not BA)

ATTACHMENT 2

Function:

PO-2 OSS Interface Availability

Definition:

"OSS Interface Availability" measures the time during which the electronic OSS Interface is actually available as a percentage of scheduled availability. Bell Atlantic service representatives and CLEC service representatives obtain pre-ordering information from the same underlying OSS. As a result, if a particular OSS is down, it is equally unavailable to Bell Atlantic employees and to CLEC employees. Any difference in availability, therefore, will be caused by unavailability of the interface.

Scheduled Availability

- Prime Time: 6 AM to 12:00 Midnight EST Monday through Saturday, excluding Holidays
- Non-Prime Time: 12:01 to 5:59 AM EST Monday through Saturday, and Sundays and Holidays

Note: the number of hours of downtime will be noted in the reports under "observations".
Separate measurements will be performed for each of the following: Pre-Ordering EDI, Pre-Ordering Web GUI, and Maintenance Web GUI. The EnView process will be expanded/updated to monitor and report on future OSS processes.

Exclusions:

The following exclusions will apply

- Troubles reported but not found in BA
- Troubles reported by a CLEC that were not reported to BA's designated trouble reporting point.

Performance Standard:

Metric PO-2-02: ≥ 99.5%

Methodology – PO-2 OSS Availability

Bell Atlantic is modifying the methodology used to calculate system outages, with implementation planned for September 1999. Bell Atlantic will continue to use EnView as a means of monitoring all BA systems, including retail OSS. However, BA will measure reported outages, based on actual reported time frames as well as any outages captured by EnView and not reported by CLECs. Additionally if an outage affects only one CLEC, the system availability will be adjusted based on the number of user ID's assigned to that CLEC. For example, if a single CLEC experienced a 3 hour outage, due to a Bell Atlantic problem, system outage would be counted, on a pro-rated basis based on the number of user ID's of the CLEC with the problem. In this way, outages that impact a single CLEC, but that do not necessarily show up in EnView will be captured. EnView will be used as an alarm for system availability and to supplement CLEC reported outages. If no CLEC reported an outage, but EnView detected an outage, the EnView outage would be included as if the entire CLEC population experienced the outage.

EnView measurement of availability of the EDI interface will be as follows: The mechanized OSS interface availability process is based on the transactions created by the EnView Robots. The program determines whether the transactions are successful or unsuccessful, or that no transactions are issued (not polled). Transactions are processed by transaction type and separately for each interface type and OSS. The hours of the day are divided into 6-minute measurement periods.
If EDI for any Pre-Order transaction type in a 6-minute measurement period has at least one successful transaction, then EDI is considered available. Unavailable time is calculated only when all EDI transactions are unsuccessful and at least one of the corresponding OSS transactions is successful. This indicates that EDI was not available while at least one OSS was available. In this case, the 6-minute measurement period is counted as "unavailable". If it is determined that no transactions were issued, then the 6-minute measurement period is excluded from all calculations since this is an indication of an EnView problem and not an EDI problem.

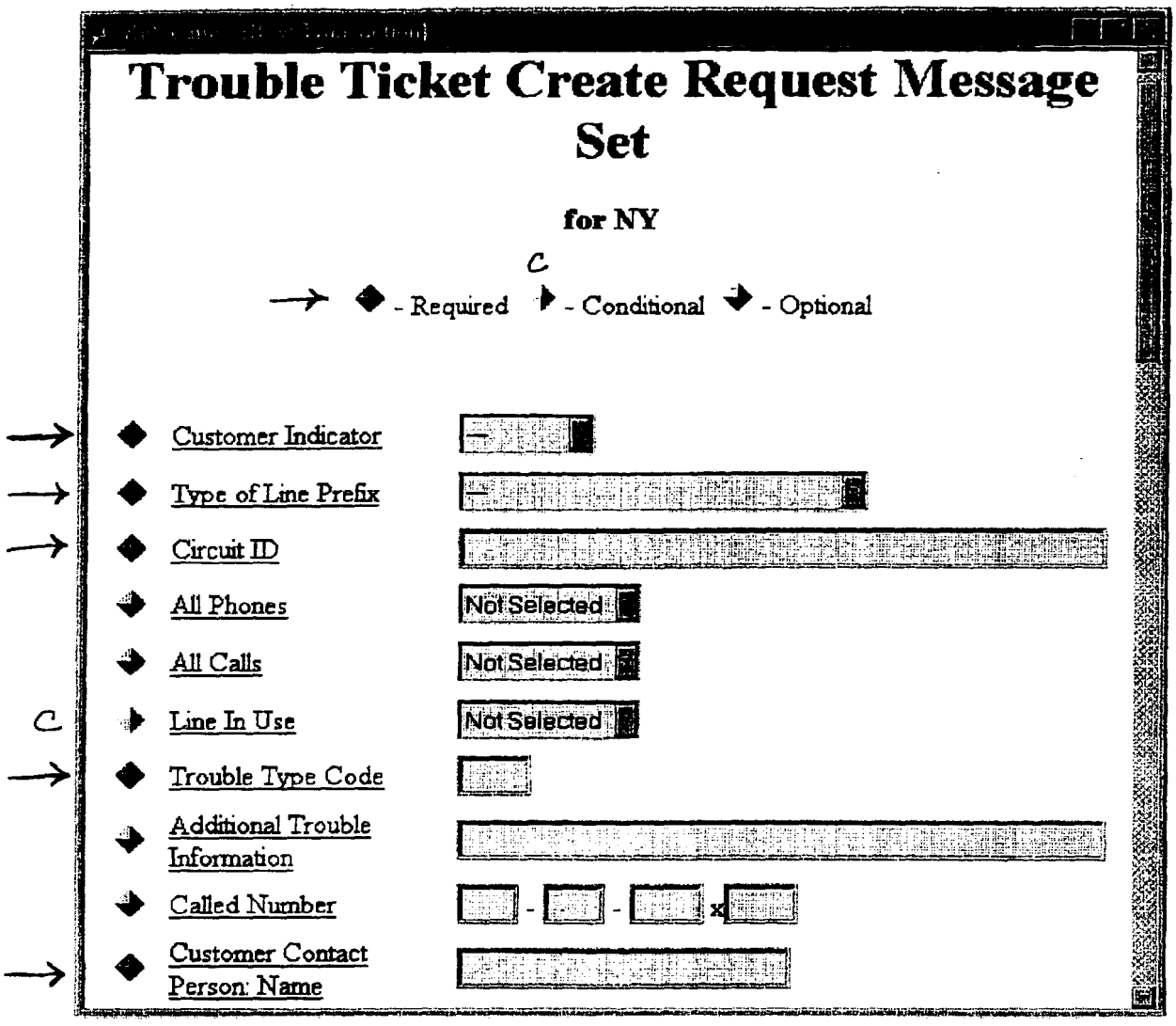
Methodology –OSS Availability (Continued):		
Availability is calculated by dividing the total number of 6-minute measurement periods in a 24-hour day (excluding unmeasured 6-minute measurement periods) into the number of periods with no successful transactions for the day and subtracting this from 1 and multiplying by 100. For example, there are potentially 160 6-minute measurement periods in a 16-hour period. If two 6-minute measurement periods lack successful transactions, then availability equals (1-(2/160)) x 100 = 98.75% Availability. **Web GUI:** BA will implement, date to be determined, a mechanized means to measure availability of the Web GUI interface. Until mechanized measurement of availability of the Web GUI interface is operational, BA will measure availability of the Web GUI interface based on out of service troubles reported by CLECs. Out of service troubles must be reported by CLECs to BA's designated trouble reporting point. Once mechanized monitoring is in effect, the Web GUI measurement will be identical to EDI. **Trouble Logs:** BA will make available for inspection by the CLEC BA's logs of CLEC reports that the interface is not available.		
Formula:		
[(Number of hours scheduled less number of scheduled hours not available) / (Number of hours scheduled)] x 100.		
Report Dimensions:		
Company: • CLEC Aggregate		Geography: • State Reporting
Products	• Maintenance Web GUI (RETAS) [4] • Pre-Order/Order Web GUI • EDI • CORBA • Maintenance – Electronic Bonding (when developed)	
Sub-Metrics – OSS Interface Availability		
PO-2-01	**OSS Interface Availability – Total**	
Calculation	**Numerator**	**Denominator**
	(Number of Hours in Month) - (Number of Hours Interface is not available during Month).	Number of Hours in Month.
PO-2-02	**OSS Interface Availability – Prime Time**	
Calculation	**Numerator**	**Denominator**
	(Number of Prime Time Hours in Month) - (Number of Prime Time Hours in Month Interface is not available).	Number of Prime Time Hours in Month.
PO-2-03	**OSS Interface Availability – Non-Prime**	
Calculation	**Numerator**	**Denominator**
	(Number of Non-Prime Time Hours in Month) - (Number of Non-Prime Time Hours in Month Interface is not available).	Number of Non-Prime Time Hours in Month.

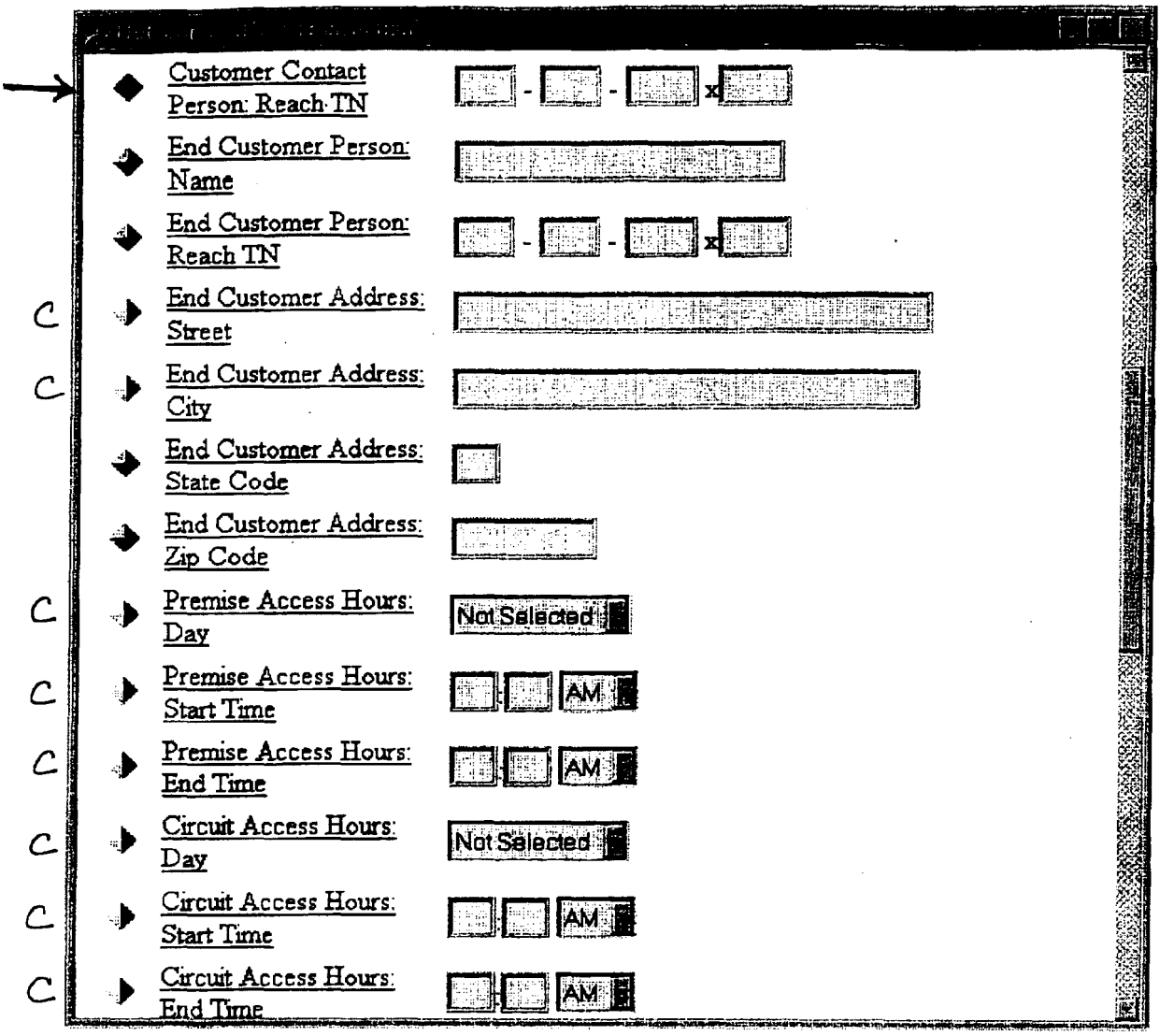
[4] WEB/GUI – Ordering and WEB/GUI – RETAS are run on the same interface (server). Performance will be identical.

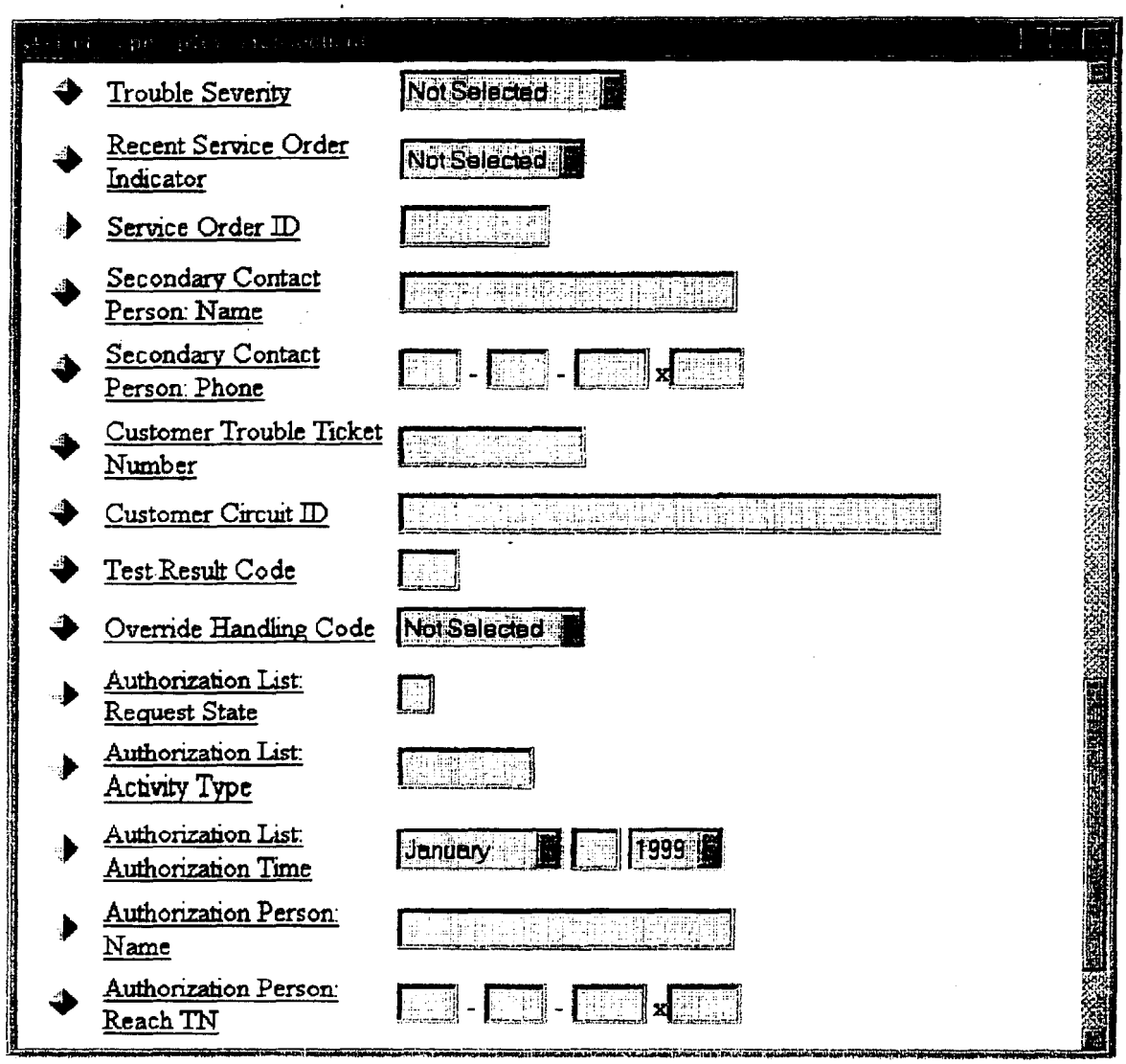
ATTACHMENT 3

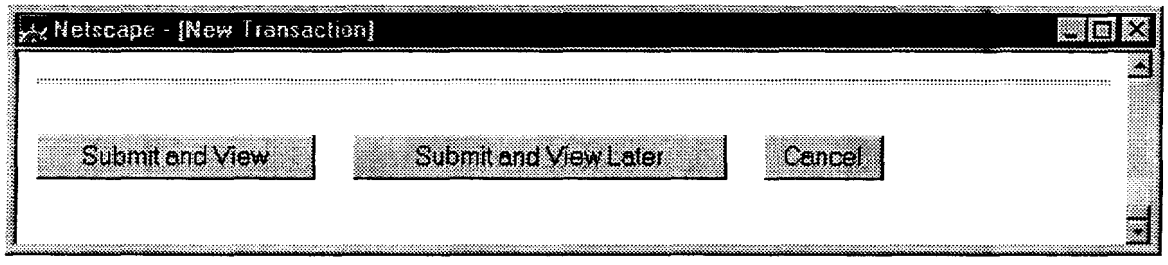
CONFIDENTIAL – NOT FOR PUBLIC INSPECTION

ATTACHMENT 4


Trouble Ticket Create Request Message Set
for NY
C
- Required
- Conditional
- Optional
Customer Indicator
Type of Line Prefix
Circuit ID
All Phones
Not Selected
All Calls
Not Selected
C
Line In Use
Not Selected
Trouble Type Code
Additional Trouble Information
Called Number
x
Customer Contact Person: Name


Customer Contact Person: Reach TN
End Customer Person: Name
End Customer Person: Reach TN
End Customer Address: Street
End Customer Address: City
End Customer Address: State Code
End Customer Address: Zip Code
Premise Access Hours: Day
Not Selected
Premise Access Hours: Start Time
AM
Premise Access Hours: End Time
AM
Circuit Access Hours: Day
Not Selected
Circuit Access Hours: Start Time
AM
Circuit Access Hours: End Time
AM


Trouble Severity
Not Selected
Recent Service Order Indicator
Not Selected
Service Order ID
Secondary Contact Person: Name
Secondary Contact Person: Phone
x
Customer Trouble Ticket Number
Customer Circuit ID
Test Result Code
Override Handling Code
Not Selected
Authorization List: Request State
Authorization List: Activity Type
Authorization List: Authorization Time
January
1999
Authorization Person: Name
Authorization Person: Reach TN
x


Netscape - [New Transaction]
Submit and View
Submit and View Later
Cancel